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June 21, 1996

DANNY E. ADAMS

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William F. Caton, Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED

JUN 21 1996

Re: CC Docket No. 96-98  
Local Interconnection

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Caton:

On behalf of Cable & Wireless, Inc., please take notice that on June 21, 1996, Alan Stiffler and Rachel Rothstein of Cable & Wireless, Inc. and I met with Daniel Gonzalez, Kasia Biernacki, Richard Welch, Melissa Newman and Edward Krachmer of the FCC. The discussion concerned CWI's comments in the above-referenced docket, as summarized in the attached materials.

In accordance with Section 1.1206 of the Commission's rules, an original and one copy of this notice and attachments are provided for inclusion in the public record.

Sincerely,



Danny E. Adams

Enclosure

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List ABCDE

# CABLE & WIRELESS INC.

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June 21, 1996



CABLE & WIRELESS, INC.



- Uncertainty of Unbundled Elements and Interconnection.
- Resale is critical to prevent discrimination and anticompetitive pricing.
  - Resale and Shared Use Decision (1976)
  - CMRS Resale Decision (June 12, 1996)
- Policy is mostly theoretical at this time.
  - Once policy is implemented, ILECs and competitors will need to experiment and test new facilities.
- Ability/timing of states to set pricing.



- Smaller CLECs may not be able to take advantage of unbundled elements for some time.
- Some carriers may remain limited to specific geographic regions -- making resale only option in low customer growth geographic areas.



- Section 251 requires that all services provided at retail must be offered for resale at wholesale rates.

- At a minimum, the FCC should require the states to make the following services available for resale within three months from release of the FCC's decision.

- Measured & flat rate residential and business service
- Measured and flat rate trunk services
- Centrex (and all feature packages)
- All other ancillary services
- All other features



- Prohibit ability of ILHCs to use promotions to thwart entry by competitors.
- Helps to ensure against anti-competitive conduct in joint marketing local and long distance service.
- Helps prevent discriminatory and anticompetitive pricing.
- All "packages" of ILHC products must be included for resale at bundled-package rate, minus avoided cost.



- FCC must prohibit ILECs from withdrawing service solely to avoid resale
- States should undertake appropriate business analysis review
- Services grandfathered to ILEC customers must be grandfathered to CLLEC resale customers



- Almost as important as services, ILECs must give access to systems to support resale, with consistent pricing.

- Access to customer information
- Ordering/provisioning
- On-line Billing/Customer Account Data
- On-line monitoring & troubleshooting



- States must enact wholesale prices for all ILEC services at avoided costs.
- States must vigorously pursue policies which prohibit the ILECs from enacting barriers to resale entry.
- States must entertain mediation requests from ILECs on resale issues.

